January 2007

Washington State Department of Health, Office of Radiation Protection

Dawn Mining Company Uranium Millsite License Renewal (WN-I043-2)

ADDENDUM TO EXISTING ENVIRONMENTAL DOCUMENTS:

- 2000 Addendum to Existing Environmental Documents
- 1994 Supplemental Final Environmental Impact Statement for Millsite Closure
- 1991 Final Environmental Impact Statement Closure of the Dawn Mining Company Uranium Millsite
- 1992 Declaration of Non-Significance for Mill Processing of Midnite Mine Water Treatment Plant Sludge

Introduction

In December 2003, Dawn Mining Company (DMC) submitted a timely application for renewal of its radioactive materials license WN-I043-2, Amendment 23, for the uranium millsite located near Ford, Washington. After a completeness review of the application, the Department of Health issued a Notice of Timely Renewal to DMC on January 21, 2004. DMC's license remained in effect until the department made a final determination regarding license renewal. In June 2006, DMC updated its license renewal application to address the department's comments on review.

The department's review also considered whether, under the State Environmental Policy Act (SEPA), there are changes to the approved closure plan that are substantial and/or involve new information indicating probable significant adverse environmental impacts not adequately evaluated in the existing environmental documents. The department's conclusion is that this license renewal does not include any changes to the approved closure plan that were not previously evaluated in existing environmental documents. The department is issuing this Addendum to existing environmental documents to document the changes to Amendment 23 of DMC's radioactive materials license.

The changes to Amendment 23: (1) remove references to mill operations; (2) remove references to a portable gauge that the company no longer possesses; (3) add a condition specifying the date that sludge disposal is to end; and (4) include minor revisions to reflect current operating procedures.

Summary of Changes to DMC's Radioactive Materials License Amendment No. 23:

<u>Mill Operations</u>: Dawn Mining Company decommissioned and buried the mill building during the summer of 2003. All references to the mill and conditions for its operation have been removed.

<u>Portable Gauge</u>: The Campbell Pacific Nuclear Model CPN-131, a portable nuclear gauge, has been transferred to another radioactive materials licensee and is no longer possessed by DMC. All references to this gauge and its operation have been removed from DMC's radioactive material's license.

Specifying End Date for Sludge Disposal: Direct disposal of Midnite Mine Water Treatment Plant sludge into TDA-4 was previously reviewed and approved (Addendum 2000). At that time, it was understood that, without further approval, direct disposal would end in 2008, but the end date was not expressly stated in the license. A new condition is added to this radioactive materials license that states, "Unless specifically approved by the department, receipt and disposal of Midnite Mine Water Treatment Plant filtercake sludge at the licensee's millsite shall cease December 31, 2008." Any extension of sludge disposal would require not only the department's approval but also that of the U.S. Department of Energy and the U.S. Nuclear Regulatory Commission.

Other: Several minor modifications to the radioactive materials license reflect current approved operating procedures.

Conclusion: DMC's closure plan complies with applicable radiation protection laws and regulations contained in RCW 70.98 and WAC 246-235. The renewed radioactive materials license (Amendment 24) allows DMC to continue proceeding with the decommissioning of the facility in accordance with the approved millsite closure plan. There are no changes to the radioactive materials license that have not already been evaluated under existing SEPA documents. Amendment 24 will be posted by January 30, 2007, on the department's website at http://www.doh.wa.gov/ehp/rp/default.htm. To receive it by email, or to receive a hard copy, contact Kristin Felix at (360) 236-3240 or at kristin.felix@doh.wa.gov, or mail your request to her at DOH Office of Radiation Protection, PO Box 47827, Olympia, WA, 98504-7827.